Edwards Investment Co. Broadcasting Engineering and Investments

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11 September

FCC MAIL ROOM

Secretary Federal Communication Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

RECEIVED

Petition to FCC requesting Rules and Regulat 51995 of FCC to be printed by U.S. Government Printing 151995 Office, as they formerly were. FCC MAIL ROOM

Gentlemen:

Some fifteen years back the U. S. Government Printing Office printed the Rules and Regulations of FCC, for three ring binders, and amendemts supplied frequently. One could subscribe to the R & Rs from the Government Printing Office at a reasonable cost, and one could keep current on changes by FCC very frequently.

The above was discontinued some fifteen or so, years ago, and the entire Broadcasting industry is virtually down and in a mess. You can seldom find a station that has complete up-to-date FCC Regulations.

A Petition regarding this was filed with FCC back in April 4, 1995, but lacked the Certificate of Service required on all Petitions. And, nothing was ever heard from the FCC on the April 1995 filing.

Therefore, the Petition is herewith being filed again with proper Certificate of Service on it.

Six copies are for FCC. An extra copy is enclosed for FCC to stamp it, and return to show the Petition has been received by FCC.

CVE/ch

Enc: Copies of Petition

Sincerely,

Cyrus V. Edwards, Lt/Colonel Broadcast Consulting Radio Engineer and Investments

FCC/NARTE/SBE Registered

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Before the FEDERAL COMMUNICATION COMMISSION Washington, D. C. 20554

RECEIVED
SEP.14 1995
FCC MAIL ROO!

PETITION

for

FEDERAL COMMUNICATION COMMISSION TO RE-INAUGURATE THE PRINTING OF FCC RULES AND REGULATIONS BY THE U. S. GOVERNMENT PRINTING OFFICE

MANY YEARS AGO, AT LEAST FIFTEEN OR TWENTY YEARS BACK,
THE FCC SUPPLIED IT'S RULES AND REGULATIONS VIA THE
U. S. GOVERNMENT PRINTING OFFICE WHERE THE PUBLIC
COULD EASILY OBTAIN THEM. THE RULES AND REGULATIONS,
AS WELL AS, UP-TO-DATE AMENDMENTS, WERE AVAILABLE FROM
THE GOVERNMENT PRINTING OFFICE ON A SUBSCRIPTION BASIS
AT A REASONABLE COST. THE REGULATIONS WERE FULL PAGE
SIZE AND PUNCHED FOR A THREE RING BINDER.

EVER SINCE THE FCC HAS QUIT SUPPLYING IT'S RULES AND REGULATIONS, LESS AND LESS, AS TIME PASSES, IS KNOWN ABOUT THE FCC OPERATIONS IN WASHINGTON. IT IS NOW VIRTUALLY IMPOSSIBLE FOR STATIONS AND INDIVIDUALS TO KEEP ABREAST OF THE FCC REQUIREMENTS, AND THE SITUATION IS GETTING WORSE WITH TIME.

THE PETITIONER HAS ACTUALLY SEEN FCC RULES AND REGULATIONS
IN STATIONS THAT WERE OF THE VINTAGE AGE, WHEN FCC DISCONTINUED SUPPLYING IT'S RULES AND REGULATIONS. AND, IT
ISN'T THE STATIONS FAULT. THEY DO NOT HAVE ACCESS TO
FCC RULES AND REGULATIONS, IF THE FCC CAN'T SUPPLY THEM.

- (A) THERE ARE THOSE THAT MIGHT SAY THE FCC RULES AND
 REGULATIONS ARE SUPPLIED BY COMMERCIAL FIRMS. THAT
 IS TRUE, BUT THIS METHOD ISN'T SATISFACTORY FOR THESE
 REASONS:
 - (a) ONLY THE WEALTHY STATIONS CAN AFFORD THE HIGH COST.
 - (b) THE INDIVIDUAL ENGINEERS, WHO DESPERATELY NEED

 TO KEEP ABREAST OF THE FCC RULES, CERTAINLY

 CAN'T AFFORD THE HIGH COST, AND HAVE TO WORK BLINDLY,

 WITHOUT UP-TO-DATE RULES AND REGULATIONS.
 - (c) STATIONS ACROSS THIS NATION IS OPERATING BLIND-LY WITHOUT UP-TO-DATE REGULATIONS IN THEIR FILES.
 - (d) AND, FCC IS RELYING ON COMMERCIAL FIRMS TO DO
 WHAT THE FCC SHOULD BE DOING. IF FCC MAKES
 RULES AND REGULATIONS, IT SHOULD BE SUPPLYING THOSE
 REGULATIONS TO THE PUBLIC.
- (B) THERE ARE THOSE THAT MIGHT SAY THE FCC RULES AND
 REGULATIONS ARE AVAILABLE IN THE FEDERAL REGISTRAR.
 THESE ARE NOT SUITABLE FOR THESE REASONS:
 - (a) ONE CAN NOT KEEP UP TO DATE ON FCC RULES AND

REGULATIONS VIA THIS METHOD. THE PETITIONER HAS USED THIS METHOD, AND IN AN ATTEMPT, TO UP DATE THE RULES AND REGULATIONS THREE YEARS LATER BY ORDERING IN A NEW VOLUME, ONLY TO BE SHIPPED THE VERY COPY THAT WAS PURCHASED THREE YEARS EARLIER.

- (b) THE FEDERAL REGISTRAR VOLUME IS A SIZE OF 5½"

 X 9", VERY STIFF TO OPEN, OR USE, AND DOES NOT

 CONTAIN THE NUMEROUS AND VALUABLE CHARTS THAT ARE

 NEEDED.
- (c) THE FEDERAL REGISTRAR VOLUME WILL NOT OPEN UP
 AND LIE FLAT. EVEN IF IT DID SHOW CHARTS AND
 GRAPHS, THAT ARE INVALUABLE, IT WOULD BE IMPOSSIBLE
 READ SUCH FROM THE VOLUME.
- (C) THERE ARE THOSE THAT MIGHT SAY THE FCC RULES AND
 REGULATIONS ARE AVAILABLE ON FLOPPY DISCS FOR USE
 ON COMPUTERS. THESE ARE NOT SUITABLE FOR THESE REASONS:
 - (a) FLOPPY DISCS ARE NOT SUITABLE AS THEY AREN"T SOMETHING THAT ONE CAN LIE FLAT, TAKE A RULER, AND READ A CHART OR GRAPH.
 - (b) NOT EVER ONE HAS THE KNOWLEDGE TO USE A COMPUTER.

 AND, VERY FEW OWNERS, MANAGERS, OR ENGINEERS OF

 STATIONS HAVE THE TIME, OR ACCESS TO THE PROPER TRAINING TO GAIN KNOWLEDGE OF COMPUTER USE.
 - (c) NOT MANY STATIONS, AND ESPECIALLY AN INDIVIDUAL,

 CAN STAND THE COST OF BUYING A COMPUTER, AND

 TO GET THE PROPER TRAINING TO USE IT.

- NEEDED INFORMATION FROM THE FCC. IF A LETTER OR
 CORRESPONDENCE IS USED, MOST OF THE TIMES IT WILL GO UNANSWERED. IF YOU DO GET A REPLY, IT MAY BE TWO OR THREE
 LATER, AND THE ANSWER IS OBSOLETE DUE TO THE TIME ELEMENT.
 HOWEVER, THE FCC DEPARTMENT ISN'T ALONE IN THIS RESPECT.
 THE PETITIONER IS STILL AWAITING A REPLY TO A LETTER TO
 THE FCC, WRITTEN SOME TWO MONTHS AGO. LETTER WAS SENT
 TWICE, STILL NO REPLY. THE PETITIONER IS STILL AWAITING
 A REPLY FROM THE CENSUS BUREAU ON A LETTER REQUESTING
 POPULATION INFORMATION, THAT WAS WRITTEN FOUR MONTHS AGO.
 THUS, IT POINTS UP THAT OUR GOVERNMENT IN WASHINGTON IS
 BECOMING MORE ISOLATED FROM THE PUBLIC, AND GETTING INFORMATION IS BECOMING IMPOSSIBLE.
- (E) HOW CAN THE FCC EXPECT STATIONS TO COMPLY WITH THEIR REQUIREMENTS, IF THE FCC DOES NOT, AND CAN'T SUPPLY THE RULES AND REGULATIONS THAT THE PUBLIC IS SORELY NEEDING.
- (F) THE FCC IS LEVYING FINES UPON STATIONS FOR VIOLATION
 OF FCC RULES AND REGULATIONS, AND STATIONS DO NOT
 HAVE ACCESS TO, AND CAN'T GET FCC RULES AND REGULATIONS
 DUE TO FCC NOT SUPPLYING THEM.
- (G) THIS BRINGS UP A LEGAL QUESTION. IS IT CONSTITUTIONAL
 FOR FCC TO BE LEVYING FINES FOR VIOLATIONS OF FCC
 RULES AND REGULATIONS, WHEN THE FCC CAN'T, AND DOES NOT
 PUBLISH IT'S RULES AND REGULATIONS, AND MAKE THEM AVAILABLE TO THE PUBLIC?

CONCLUSION

FOR ALL THE FORE-GOING REASONS, WHICH IS STRONG JUSTIFICATION, THE PETITIONER HEREIN PLEADS FOR THE FCC TO GIVE THIS PETITION STRONG CONSIDERATION FOR FCC TO RE-INAUGURATE THE PRINTING OF FCC RULES AND REGULATIONS, AND AMENDMENTS, BY THE U. S. GOVERNMENT PRINTING OFFICE, PUNCHED FOR THREE RING BINDERS. AND THEREFORE, MAKING THE RULES AND REGULATIONS AVAILABLE ON A SUBSCRIPTION BASIS AT A LOW COST TO STATIONS, INDIVIDUALS, AND THE PUBLIC, AS WAS FORMERLY DONE.

FAVORABLE RULING ON THIS PETITION WILL CORRECT THE RULE AND REGULATION SITUATION WHICH IS IN A DESPERATE MESS ACROSS THIS NATION.

Respectfully submitted,

Cyrus V. Edwards, Lt/Colonel

Petitioner

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Dist:

6 copies. FCC

CERTIFICATE OF SERVICE

I, Lt/Colonel Cyrus V. Edwards, hereby certify that on this 11 day of September, 1995, I meiled by U.S. Parcel Post, First Class Mail, postage paid, a copy or copies of the foregoing Petition Document to the following:

Secretary (6 copies)
Federal Communication Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Norman Goldstein, Esq. (Copy)
Hearing Branch
Mass Media Bureau
Federal Communication Commission
2025 M Street, N.W., Room 7212
Washington, D.C. 20554

Cyrus V. Edwards, Lt/Colonel Broadcast Consulting Radio Engineer and Investments

Dated: September 11, 1995